

**Lynne B. Morgan, OSB 89099**  
lbmorgan@worldnet.att.net  
1 SW Columbia, Suite 1110  
Portland, OR 97258  
Telephone: 503/417-4476  
Facsimile: 503/227-7829

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA,

No. CR 01-321 KI

Plaintiff,

vs.

VAN BRINK ET. AL,

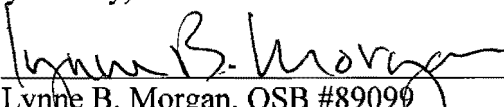
Motion for Order Authorizing the  
Deposition of John "Hans" Zuercher  
Pursuant to Federal Rule of Criminal  
Procedure 15

Defendants.

**Hearing Requested**

COMES NOW defendant, Laurent E. Barnabe, by and through counsel, on behalf of all Defendants, and, pursuant to Federal Rule of Criminal Procedure 15, hereby moves this Court for an order authorizing the taking of the deposition of John "Hans" Zuercher. This motion is based on the affidavit of counsel, attached to this motion and incorporated by reference herein, and the separately filed Memorandum of Law in Support of Motions for Depositions Pursuant to Federal Rule of Criminal Procedure 15, also incorporated by reference herein.

RESPECTFULLY SUBMITTED this 19<sup>th</sup> day of May, 2006.

  
Lynne B. Morgan, OSB #89099  
Attorney for Laurent E. Barnabe

*United States v. Brink et. al*  
*USDC Oregon CR 01-321KI*

SOLO - Motion for Order Authorizing the Deposition of John "Hans" Zuercher  
Pursuant to Federal Rule of Criminal Procedure 15

FILED MAY 19 12 57 PM 2006

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CERTIFICATE OF SERVICE

I hereby certify that on 19 May 2006, I served a copy of the foregoing:

*Motion for Order Authorizing the Deposition of John "Hans" Zuercher  
Pursuant to Federal Rule of Criminal Procedure 15*

on counsel for each defendant and the government by mailing to said attorney a copy  
by First Class Mail, postage paid, deposited in the United States Mail at Portland,  
Oregon, addressed to said attorney at his/her last known address listed below, or by  
personally delivering to said attorney:

**Attorneys for the Government:**

Claire Fay  
Assistant United States Attorney  
1000 SW Third Avenue, Suite 600  
Portland, OR 97204

Kent Robinson  
Assistant United States Attorney  
1000 SW Third Avenue, Suite 600  
Portland, OR 97204

**Attorneys for Laurent Barnabe:**

Lynne B. Morgan  
Attorney at Law  
1 SW Columbia Street, Suite 1110  
Portland, OR 97258

Douglas Stringer  
Attorney at Law  
1211 SW 5th Ave Ste 2950  
Portland OR 97204

**Attorneys for Rita Regale:**

Philip A. Lewis  
Attorney at Law  
111 SW Fifth Avenue, Suite 1650  
Portland, OR 97204

Gail Meyer  
Attorney at Law  
3933 NE 32nd Place  
Portland, OR 97212

**Attorneys for Robert Skirving:**

Kristen Winemiller  
Attorney at Law  
1420 World Trade Center  
121 SW Salmon Street  
Portland, OR 97204

Jacob Wieselmann  
Attorney at Law  
1420 World Trade Center  
121 SW Salmon Street  
Portland, OR 97204

**Attorneys for Douglas Ferguson:**

Thomas Coan  
Attorney at Law  
621 SW Morrison St., Suite 1150  
Portland, OR 97205

Laurie Shertz  
Attorney at Law  
121 SW Salmon, 11<sup>th</sup> Floor  
Portland, OR 97204



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LAURIE SHERTZ, LLC, OSB #96477  
Attorney for Douglas Ferguson